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Docket No.: 050059-0048 PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of	:	Customer Number: 20277
Hideo SAMURA	:	Confirmation Number: 7482
Application No.: 09/343,092	:	Tech Center Art Unit: 2853
Filed: June 30, 1999	:	Examiner: Nguyen, Lam S.

For: HEAD FOR INK-JET PRINTER HAVING PIEZOELECTRIC ELEMENTS PROVIDED FOR EACH INK NOZZLE (AS AMENDED)

REPLY BRIEF

Mail Stop Reply Brief
Honorable Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

This Reply Brief is filed under 37 CFR 1.193(b)(1) in response to the Examiner's Answer (hereinafter "Answer"), dated November 25, 2005. Rejected claims 1, 4 through 7 and 11 remain on appeal. Appellant maintains the position that these claims stand improperly rejected. All arguments contained in the Principal Brief are reasserted herein, with the exception that the sentence bridging pages 5 and 6 of the Principal Brief should read: "[t]he cited paragraph does not relate the opening to the piezoelectric elements and does not teach that location of the ink supply port between piezoelectric elements provides better stabilization than location at other regions close to the piezoelectric elements." Reference is made herein to the Principal Brief for its descriptions of the applied references and arguments advanced for patentability. The following commentary focuses on the portion of the Answer (identified therein as "10") that is a response to the Principal Brief.

The Answer asserts that "Cruz-Uribe's deficiency, however, is cured by Hasegawa's silicon substrate . . . ." However, neither the final Office Action nor the Answer sets forth a reason why a

person of ordinary skill in the art would have been motivated to construct the nozzle plate 54 and the base plate 56 of the monocrystalline silicon material described by Hasegawa.

It is submitted that the paragraph bridging pages 5 and 6 of the Answer is based on improper application of hindsight rationale. Column 2, lines 21-30 of Chang is silent in regard to transducer elements. That paragraph, instead, teaches that crosstalk is prevented by absorption of the pressure of reverse ink flow by the ink tank, which acts as a buffer. The extension in the Answer of the referenced Chang portion, to conclude that the described crosstalk benefit is attributable to location of a common ink supply located between transducer elements, finds no such teaching in Chang. Such conclusion is contradicted by Chang at column 6, lines 41-43. This portion expressly states that the same effects can be attained when pressure generating chambers are arranged on only one side of the ink communication path.

Reversal of the rejection of all claims on appeal is respectfully solicited. To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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